

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO,
et al.,

Plaintiffs,

v.

STATE OF TEXAS, et al.,

Defendants.

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Civil Action No. 5:21-CV-0844-XR
(Consolidated Cases)

***LUPE, OCA-GREATER HOUSTON, HOUSTON JUSTICE, LULAC, and MI FAMILIA
VOTA PLAINTIFFS' FIRST AMENDED RULE 26(a)(1) INITIAL DISCLOSURES***

Pursuant to Federal Rule of Civil Procedure 26(a)(1) and this Court's November 18, 2021 Order, ECF No. 125, Plaintiffs in the matters of *La Unión Del Pueblo Entero, et al. v. Gregory W. Abbott, et al.* (Case No. 5:21-cv-0844-XR); *OCA-Greater Houston, et al. v. Jose A. Esparza, et al.* (Case No. 1:21-cv-0780-XR); *Houston Justice, et al. v. Gregory Wayne Abbott, et al.* (Case No. 5:21-cv-0848-XR); *LULAC Texas, et al. v. Jose Esparza, et al.* (Case No. 1:21-cv-0786-XR); and *Mi Familia Vota, et al. v. Greg Abbott, et al.* (Case No. 5:21-cv-0920-XR) make the following first amended initial disclosures:

I. Initial Disclosure Qualifications

These first amended initial disclosures are made upon information presently known to Plaintiffs and without prejudice to Plaintiffs' right to produce during discovery or at trial such data, information or documents as are: (a) subsequently discovered; (b) subsequently determined to be relevant for any purpose; or (c) subsequently determined to have been omitted from this and any supplemental disclosure statements. By making these disclosures, Plaintiffs do not represent that they are identifying every document, tangible thing, or witness that may be

relevant to the issues in this lawsuit, or on which Plaintiffs may rely in support of their claims or defenses. Nor do Plaintiffs waive their rights to object to the disclosure of any person, document, or thing on the basis of any applicable privilege, the work product doctrine, relevancy, competency, materiality, undue burden, hearsay, or any other valid objection in response to any discovery request or proceeding in this case. Further, Plaintiffs reserve all rights to present at trial or other hearing in this matter additional witnesses and evidence not presently identified or encompassed by these disclosures, and to present any rebuttal or impeachment evidence they deem appropriate.

II. First Amended Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(i))

The following individuals are likely to have discoverable information that Plaintiffs may use to support their claims and/or defenses, not including information to be used solely for impeachment. The general subject matter of information listed for each individual does not in any way limit Plaintiffs' right to question or call any individual listed to testify regarding any other subject. In addition, Plaintiffs may retain one or more experts in this matter and will disclose the identities of their experts, if any, in accordance with requirements of the Federal Rules of Civil Procedure and any scheduling or other order of the Court.

1. Juanita Valdez-Cox on behalf of Plaintiff La Unión del Pueblo Entero ("LUPE")

Ms. Valdez-Cox may be contacted through counsel for the *LUPE* Plaintiffs. Ms. Valdez-Cox has knowledge of facts alleged in the Complaint, including the effect of SB1 on LUPE's

members and its voter registration, voter education, and get out the vote activities, as described in the *LUPE* Amended Complaint.

2. Pastor Danielle Ayers on behalf of Plaintiff Friendship-West Baptist Church (“FRIENDSHIP-WEST”)

Pastor Ayers may be contacted through counsel for the *LUPE* Plaintiffs. Pastor Ayers has knowledge of facts alleged in the Complaint, including the effect of SB1 on FRIENDSHIP-WEST’s congregants and its voter registration, voter education, and get out the vote activities, and recruitment of election workers, as described in the *LUPE* Amended Complaint.

3. Cheryl Drazin on behalf of Plaintiff Anti-Defamation League Austin, Southwest, and Texoma Regions (“ADL”)

Ms. Drazin may be contacted through counsel for the *LUPE* Plaintiffs. Ms. Drazin has knowledge of facts alleged in the Complaint, including the effect of SB1 on ADL’s supporters and its voter education and outreach activities, as described in the *LUPE* Amended Complaint.

4. Lydia Camarillo on behalf of Plaintiff Southwest Voter Registration Education Project (“SVREP”)

Ms. Camarillo may be contacted through counsel for the *LUPE* Plaintiffs. Ms. Camarillo has knowledge of facts alleged in the Complaint, including the effect of SB1 on SVREP’s employees and volunteers and its voter registration, voter education, and get out the vote activities, as described in the *LUPE* Amended Complaint.

5. Joshua Houston on behalf of Plaintiff Texas Impact

Mr. Houston may be contacted through counsel for the *LUPE* Plaintiffs. Mr. Houston has knowledge of facts alleged in the Complaint, including the effect of SB1 on TEXAS IMPACT’s members and its voter registration, voter education, and get out the vote activities, and recruitment of election workers, as described in the *LUPE* Amended Complaint.

6. Jana Ortega on behalf of Plaintiff Mexican American Bar Association of Texas (“MABA-TX”)

Ms. Ortega may be contacted through counsel for the *LUPE* Plaintiffs. Ms. Ortega has knowledge of facts alleged in the Complaint, including the effect of SB1 on MABA-TX’s members and its voter education and get out the vote activities, as described in the *LUPE* Amended Complaint.

7. Joey Cardenas III on behalf of Plaintiff Texas Hispanics Organized for Political Education (“TEXAS HOPE”)

Mr. Cardenas may be contacted through counsel for the *LUPE* Plaintiffs. Mr. Cardenas has knowledge of facts alleged in the Complaint, including the effect of SB1 on TEXAS HOPE’s members and its voter education and get out the vote activities, and recruitment of election workers, as described in the *LUPE* Amended Complaint.

8. Gloria Gonzales-Dholakia on behalf of Plaintiff Jolt Action

Ms. Gonzales-Dholakia may be contacted through counsel for the *LUPE* Plaintiffs. Ms. Gonzales-Dholakia has knowledge of facts alleged in the Complaint, including the effect of SB1 on JOLT ACTION’s members and its voter education and get out the vote activities, as described in the *LUPE* Amended Complaint.

9. Lydia Camarillo on behalf of Plaintiff William C. Velasquez Institute (“WCVI”)

Ms. Camarillo may be contacted through counsel for the *LUPE* Plaintiffs. Ms. Camarillo has knowledge of facts alleged in the Complaint, including the effect of SB1 on WCVI’s research to improve the level of political and economic participation in Latino and other underrepresented communities, as described in the *LUPE* Amended Complaint.

10. Cesar Espinosa on behalf of Plaintiff FIEL Houston Inc. (“FIEL”)

Mr. Espinosa may be contacted through counsel for the *LUPE* Plaintiffs. Mr. Espinosa has knowledge of facts alleged in the Complaint, including the effect of SB1 on FIEL’s members and its voter education and get out the vote activities, as described in the *LUPE* Amended Complaint.

11. Plaintiff James Lewin

Mr. Lewin may be contacted through counsel for the *LUPE* Plaintiffs. Mr. Lewin has knowledge of facts alleged in the Complaint, including the effect of SB1 on his ability to serve as an election judge without facing criminal prosecution, as described in the *LUPE* Amended Complaint.

12. Grace Chimene on behalf of Plaintiff League of Women Voters of Texas

Ms. Chimene may be contacted through counsel for the *OCA-Greater Houston* Plaintiffs. Ms. Chimene is the President of the League of Women Voters of Texas. She has general knowledge of the operations of the organization and the activities of its members and subordinate components.

13. Michelle Tremillo on behalf of Plaintiff Texas Organizing Project

Ms. Tremillo may be contacted through counsel for the *OCA-Greater Houston* Plaintiffs. Ms. Tremillo is the Executive Director of Texas Organizing Project. She has general knowledge of the operations of the organization and the activities of its members and programs.

14. Bob Kafka on behalf of Plaintiff REV-UP Texas

Mr. Kafka may be contacted through counsel for the *OCA-Greater Houston* Plaintiffs. Mr. Kafka is the President of REV-UP Texas. He has general knowledge of the operations of the

organization and the activities of its members. Additionally, he is likely to have general information regarding the needs of voters with disabilities across Texas.

15. Ruben Fernandez on behalf of Plaintiffs The Arc of Texas and REV-UP Texas

Mr. Fernandez may be contacted through counsel for the *Houston Justice* and *OCA-Greater Houston* Plaintiffs. Mr. Fernandez is a member of The Arc of Texas and REV-UP Texas and is a voter with disabilities residing in El Paso County.

16. David Chapple on behalf of Plaintiff REV-UP Texas

Mr. Chapple may be contacted through counsel for the *OCA-Greater Houston* Plaintiffs. Mr. Chapple is a member of REV-UP Texas and is a voter with disabilities residing in Travis County.

17. Amy Litzinger on behalf of Plaintiffs The Arc of Texas and REV-UP Texas

Ms. Litzinger may be contacted through counsel for the *Houston Justice* and *OCA-Greater Houston* Plaintiffs. Ms. Litzinger is a member of The Arc of Texas and REV-UP Texas and is a voter with disabilities residing in Travis County.

18. Laura Halvorson on behalf of Plaintiffs The Arc of Texas and REV-UP Texas

Ms. Halvorson may be contacted through counsel for the *Houston Justice* and *OCA-Greater Houston* Plaintiffs. Ms. Halvorson is a member of The Arc of Texas and REV-UP Texas and is a voter with disabilities residing in Bexar County.

19. Courtney Pugh on behalf of Plaintiff The Arc of Texas

Ms. Pugh may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Pugh is a member of The Arc of Texas and is a voter with disabilities residing in Denton County.

20. Deborah Chen on behalf of Plaintiff OCA-Greater Houston

Ms. Chen may be contacted through counsel for the *OCA-Greater Houston* Plaintiffs.

Ms. Chen is the Civic Engagement Program Director for OCA-Greater Houston. She has general knowledge of the operations of the organization, its civic engagement programs, and the activities of its members and subordinate components. Additionally, she is likely to have general information about the needs of Asian-American voters throughout Texas, including in Harris, Fort Bend, and Travis counties.

21. Emily Timm on behalf of Plaintiff Workers Defense Action Fund

Ms. Timm may be contacted through counsel for the *OCA-Greater Houston* Plaintiffs.

Ms. Timm is the Co-Executive Director of Workers Defense Action Fund. She has general knowledge of the operations of the organization and the activities of its members and subordinate components.

22. Tina Kingshill on behalf of Plaintiff Houston Justice

Ms. Kingshill may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Kingshill is the Coordinating Director of Houston Justice. She has knowledge of information regarding Houston Justice's provisions of applications to vote by mail to inmates at the Harris County Jail. She also has knowledge of information regarding the effect of SB1 on Houston Justice's operations.

23. Durrel Douglas on behalf of Plaintiff Houston Justice

Mr. Douglas may be contacted through counsel for the *Houston Justice* Plaintiffs. Mr. Douglas is the Founder and Executive Director of Houston Justice. He has knowledge of information regarding Houston Justice's Mission. He also has information regarding the effect of SB1 on Houston Justice's operations.

24. Judson Robinson III on behalf of Plaintiff Houston Area Urban League (“HAUL”)

Mr. Robinson may be contacted through counsel for the *Houston Justice* Plaintiffs. Mr. Robinson is the President & CEO of HAUL. He has knowledge of information regarding HAUL’s history, mission, and political participation activities; HAUL’s political participation activities in Texas; the effects of SB1 on HAUL’s political participation resources and activities; the effects of SB1 on voters’ ability to cast a ballot that will count in Texas; and HAUL’s activities related to election legislation in 2021.

25. Ray Shackelford on behalf of Plaintiff Houston Area Urban League

Mr. Shackelford may be contacted through counsel for the *Houston Justice* Plaintiffs. Mr. Shackelford has knowledge of information regarding HAUL’s history, mission, and political participation activities; HAUL’s political participation activities in Texas; the effects of SB1 on HAUL’s political participation resources and activities; the effects of SB1 on voters’ ability to cast a ballot that will count in Texas; and HAUL’s activities related to election legislation in 2021.

26. Beverly Evans Smith on behalf of Plaintiff Delta Sigma Theta

Ms. Evans Smith may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Evans Smith is the National President and Chief Executive Officer of Delta Sigma Theta. She has knowledge of information regarding Delta Sigma Theta’s history, mission, and political participation activities; Delta Sigma Theta’s political participation activities in Texas; the effects of SB1 on Delta Sigma Theta’s political participation resources and activities; the effects of SB1 on members’ ability to cast a ballot that will count in Texas; and Delta Sigma Theta’s activities related to election legislation in 2021.

27. Shavon Arline-Bradle on behalf of Plaintiff Delta Sigma Theta

Ms. Arline-Bradle may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Arline-Bradle is the Co-Chair of the Social Action Commission for Delta Sigma Theta. She has knowledge of information regarding Delta Sigma Theta's history, mission, and political participation activities; Delta Sigma Theta's political participation activities in Texas; the effects of SB1 on Delta Sigma Theta's political participation resources and activities; the effects of SB1 on members' ability to cast a ballot that will count in Texas; and Delta Sigma Theta's activities related to election legislation in 2021.

28. Rhonda Briggins on behalf of Plaintiff Delta Sigma Theta

Ms. Briggins may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Briggins is the Co-Chair of the Social Action Commission for Delta Sigma Theta. She has knowledge of information regarding Delta Sigma Theta's history, mission, and political participation activities; Delta Sigma Theta's political participation activities in Texas; the effects of SB1 on Delta Sigma Theta's political participation resources and activities; the effects of SB1 on members' ability to cast a ballot that will count in Texas; and Delta Sigma Theta's activities related to election legislation in 2021.

29. Mythe Kirven on behalf of Plaintiff Delta Sigma Theta

Ms. Kirven may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Kirven is the Texas Social Action Coordinator for Delta Sigma Theta. She has knowledge of information regarding Delta Sigma Theta's history, mission, and political participation activities; Delta Sigma Theta's political participation activities in Texas; the effects of SB1 on Delta Sigma Theta's political participation resources and activities; the effects of SB1 on members' ability to

cast a ballot that will count in Texas; and Delta Sigma Theta's activities related to election legislation in 2021.

30. Sharon Jones on behalf of Plaintiff Delta Sigma Theta

Ms. Jones may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Jones is the Texas Social Action Coordinator for Delta Sigma Theta. She has knowledge of information regarding Delta Sigma Theta's history, mission, and political participation activities; Delta Sigma Theta's political participation activities in Texas; the effects of SB1 on Delta Sigma Theta's political participation resources and activities; the effects of SB1 on members' ability to cast a ballot that will count in Texas; and Delta Sigma Theta's activities related to election legislation in 2021.

31. Jona Denise Sargent on behalf of Plaintiff Delta Sigma Theta

Ms. Sargent may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Sargent is a soror of Delta Sigma Theta. She has knowledge of information regarding drive-thru voting in Harris County; individuals who voted early at a drive-thru voting location in Harris County; and voters who would like to continue to vote by drive-thru voting.

32. Eileen Barrett Williams on behalf of Plaintiff Delta Sigma Theta

Ms. Williams may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Williams is a soror of Delta Sigma Theta. She has knowledge of information regarding drive-thru voting in Harris County; individuals who voted early at a drive-thru voting location in Harris County; and voters who would like to continue to vote by drive-thru voting.

33. Debra Weatherspoon on behalf of Plaintiff Delta Sigma Theta

Ms. Weatherspoon may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Weatherspoon is a soror of Delta Sigma Theta. She has knowledge of information regarding

drive-thru voting in Harris County; individuals who voted early at a drive-thru voting location in Harris County; voters who would like to continue to vote by drive-thru voting; voters who received an unsolicited vote-by-mail ballot application from the Harris County Elections Administrator for the November 2020 presidential election; voters who received an unsolicited vote-by-mail ballot application from the Harris County Elections Administrator and voted by mail in the November 2020 presidential election; and voters who would like to continue to receive unsolicited vote-by-mail ballot applications from the Harris County Elections Administrator.

34. Janet Warren-Clayton on behalf of Plaintiff Delta Sigma Theta

Ms. Warren-Clayton may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Warren-Clayton is a soror of Delta Sigma Theta. She has knowledge of information regarding 24-hour voting in Harris County; individuals who voted between 7 pm and 7 am during the early voting period in the 2020 general election; and voters who would like to continue to vote during a 24-hour period.

35. Rose Mary McGowan on behalf of Plaintiff Delta Sigma Theta

Ms. McGowan may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. McGowan is a soror of Delta Sigma Theta. She has knowledge of information regarding voters who received an unsolicited vote-by-mail ballot application from the Harris County Elections Administrator for the November 2020 presidential election; voters who received an unsolicited vote-by-mail ballot application from the Harris County Elections Administrator and voted by mail in the November 2020 presidential election; and voters who would like to continue to receive unsolicited vote-by-mail ballot applications from the Harris County Elections Administrator.

36. Linda Bell Robinson on behalf of Plaintiff Delta Sigma Theta

Ms. Bell may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Bell is a soror of Delta Sigma Theta. She has knowledge of information regarding voters who received an unsolicited vote-by-mail ballot application from the Harris County Elections Administrator for the November 2020 presidential election; voters who received an unsolicited vote-by-mail ballot application from the Harris County Elections Administrator and voted by mail in the November 2020 presidential election; voters who would like to continue to receive unsolicited vote-by-mail ballot applications from the Harris County Elections Administrator; sorors who provide assistance to voters; sorors who provided voters assistance in elections in 2020; sorors who provide training to other sorors or Texans on how to provide assistance to voters in Texas elections; sorors who will continue to provide assistance to other voters in future elections; and sorors who will provide voter assistance training to other sorors or the public prior to future elections.

37. Evelyn Banks on behalf of Plaintiff Delta Sigma Theta

Ms. Banks may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Banks is a soror of Delta Sigma Theta. She has knowledge of information regarding voters who received an unsolicited vote-by-mail ballot application from the Harris County Elections Administrator for the November 2020 presidential election; voters who received an unsolicited vote-by-mail ballot application from the Harris County Elections Administrator and voted by mail in the November 2020 presidential election; and voters who would like to continue to receive unsolicited vote-by-mail ballot applications from the Harris County Elections Administrator.

38. Rosalie Buggs on behalf of Plaintiff Delta Sigma Theta

Ms. Buggs may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Buggs is a soror of Delta Sigma Theta. She has knowledge of information regarding voters who received an unsolicited vote-by-mail ballot application from the Harris County Elections Administrator for the November 2020 presidential election; voters who received an unsolicited vote-by-mail ballot application from the Harris County Elections Administrator and voted by mail in the November 2020 presidential election; and voters who would like to continue to receive unsolicited vote-by-mail ballot applications from the Harris County Elections Administrator.

39. Elnita Bates on behalf of Plaintiff Delta Sigma Theta

Ms. Bates may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Bates is a soror of Delta Sigma Theta. She has knowledge of information regarding voters who received an unsolicited vote-by-mail ballot application from the Harris County Elections Administrator for the November 2020 presidential election; voters who received an unsolicited vote-by-mail ballot application from the Harris County Elections Administrator and voted by mail in the November 2020 presidential election; voters who would like to continue to receive unsolicited vote-by-mail ballot applications from the Harris County Elections Administrator; sorors who provide assistance to voters; sorors who provided voters assistance in elections in 2020; sorors who provide training to other sorors or Texans on how to provide assistance to voters in Texas elections; sorors who will continue to provide assistance to other voters in future elections; and sorors who will provide voter assistance training to other sorors or the public prior to future elections.

40. Stephanie Morales on behalf of Plaintiff Delta Sigma Theta

Ms. Morales may be contacted through counsel for the Houston Justice Plaintiffs. Ms. Morales is a soror of Delta Sigma Theta. She has knowledge of information regarding sorors who provide assistance to voters; sorors who provided voters assistance in elections in 2020; sorors who provide training to other sorors or Texans on how to provide assistance to voters in Texas elections; sorors who will continue to provide assistance to other voters in future elections; and sorors who will provide voter assistance training to other sorors or the public prior to future elections.

41. Deborah Spell on behalf of Plaintiff Delta Sigma Theta

Ms. Spell may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Spell is a soror of Delta Sigma Theta. She has knowledge of information regarding sorors who provide assistance to voters; sorors who provided voters assistance in elections in 2020; sorors who provide training to other sorors or Texans on how to provide assistance to voters in Texas elections; sorors who will continue to provide assistance to other voters in future elections; and sorors who will provide voter assistance training to other sorors or the public prior to future elections.

42. Avis J. Davis on behalf of Plaintiff Delta Sigma Theta

Ms. Davis may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Davis is a soror of Delta Sigma Theta. She has knowledge of information regarding sorors who provide assistance to voters; sorors who provided voters assistance in elections in 2020; sorors who provide training to other sorors or Texans on how to provide assistance to voters in Texas elections; sorors who will continue to provide assistance to other voters in future elections; and

sorors who will provide voter assistance training to other sorors or the public prior to future elections.

43. Gloria Mitchell on behalf of Plaintiff Delta Sigma Theta

Ms. Mitchell may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Mitchell is a soror of Delta Sigma Theta. She has knowledge of information regarding sorors who provide assistance to voters; sorors who provided voters assistance in elections in 2020; sorors who provide training to other sorors or Texans on how to provide assistance to voters in Texas elections; sorors who will continue to provide assistance to other voters in future elections; and sorors who will provide voter assistance training to other sorors or the public prior to future elections.

44. Hazel Phillips on behalf of Plaintiff Delta Sigma Theta

Ms. Phillips may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Phillips is a soror of Delta Sigma Theta. She has knowledge of information regarding sorors who provide assistance to voters; sorors who provided voters assistance in elections in 2020; sorors who provide training to other sorors or Texans on how to provide assistance to voters in Texas elections; sorors who will continue to provide assistance to other voters in future elections; and sorors who will provide voter assistance training to other sorors or the public prior to future elections.

45. Jennifer Martinez on behalf of Plaintiff The Arc of Texas

Ms. Martinez may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Martinez is the Chief Executive Officer of The Arc of Texas. She has knowledge of information regarding The Arc of Texas's history, mission, programs, and advocacy; the effect of SB1 and related legislation on The Arc of Texas' resources and activities; The Arc of Texas' activities

related to election legislation in 2021; The Arc of Texas' and members' testimony to legislators regarding SB1 and similar legislation; The Arc of Texas' correspondence with legislators regarding SB1 and similar legislation; The Arc of Texas' work with media regarding SB1 and related legislation; and The Arc of Texas' communication with stakeholders and the general public about SB1 and related legislation.

46. Ashley Ford on behalf of Plaintiff The Arc of Texas

Ms. Ford may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Ford is the Director of Public Policy & Advocacy for The Arc of Texas. She has knowledge of information regarding The Arc of Texas's history, mission, programs, and advocacy; the effect of SB1 and related legislation on The Arc of Texas' resources and activities; The Arc of Texas' activities related to election legislation in 2021; The Arc of Texas' and members' testimony to legislators regarding SB1 and similar legislation; The Arc of Texas' correspondence with legislators regarding SB1 and similar legislation; The Arc of Texas' work with media regarding SB1 and related legislation; and The Arc of Texas' communication with stakeholders and the general public about SB1 and related legislation.

47. Alex Cogan on behalf of Plaintiff The Arc of Texas

Mr. Cogan may be contacted through counsel for the *Houston Justice* Plaintiffs. Mr. Cogan is the Manager of Public Policy & Advocacy for The Arc of Texas. He has knowledge of information regarding The Arc of Texas's history, mission, programs, and advocacy; the effect of SB1 and related legislation on The Arc of Texas' resources and activities; The Arc of Texas' activities related to election legislation in 2021; The Arc of Texas' and members' testimony to legislators regarding SB1 and similar legislation; The Arc of Texas' correspondence with legislators regarding SB1 and similar legislation; The Arc of Texas' work with media regarding

SB1 and related legislation; and The Arc of Texas' communication with stakeholders and the general public about SB1 and related legislation.

48. Ginger Mayeux on behalf of Plaintiff The Arc of Texas

Ms. Mayeux may be contacted counsel for the *Houston Justice* Plaintiffs. Ms. Mayeux is a contractor for The Arc of Texas. She has knowledge of information regarding The Arc of Texas's history, mission, programs, and advocacy; the effect of SB1 and related legislation on The Arc of Texas' resources and activities; The Arc of Texas' activities related to election legislation in 2021; The Arc of Texas' and members' testimony to legislators regarding SB1 and similar legislation; The Arc of Texas' correspondence with legislators regarding SB1 and similar legislation; The Arc of Texas' work with media regarding SB1 and related legislation; and The Arc of Texas' communication with stakeholders and the general public about SB1 and related legislation.

49. Summer Mandell on behalf of Plaintiff The Arc of Texas

Ms. Mandell may be contacted through counsel for the *Houston Justice* Plaintiffs. Ms. Mandell is the Director of Communications and Marketing. She has knowledge of information regarding The Arc of Texas's history, mission, programs, and advocacy; the effect of SB1 and related legislation on The Arc of Texas' resources and activities; The Arc of Texas' activities related to election legislation in 2021; The Arc of Texas' and members' testimony to legislators regarding SB1 and similar legislation; The Arc of Texas' correspondence with legislators regarding SB1 and similar legislation; The Arc of Texas' work with media regarding SB1 and related legislation; and The Arc of Texas' communication with stakeholders and the general public about SB1 and related legislation.

50. Plaintiff Jeffrey Lamar Clemmons

Mr. Clemmons may be contacted through counsel for the *Houston Justice* Plaintiffs. Mr. Clemmons has knowledge of information regarding his political participation activities; his advocacy related to certain proposed changes to election laws in Texas; his work as an election judge in Texas; the potential impacts of SB1 on him; and the potential impacts of SB1 on his ability to serve as an election judge in future elections.

51. Rodolfo “Rudy” Rosales, Jr. on behalf of Plaintiff LULAC Texas

Mr. Rosales may be contacted through counsel for the *LULAC* Plaintiffs. Mr. Rosales is the State Director of LULAC Texas (“LULAC”). He may have discoverable information regarding the allegations in the complaint, including but not limited to the harm that LULAC, LULAC members, and/or other similarly situated Texas voters have suffered and will suffer absent a permanent injunction granting the relief that they seek in this case.

52. Maria Teresa Kumar on behalf of Plaintiff Voto Latino

Ms. Kumar may be contacted through counsel for the *LULAC* Plaintiffs. Ms. Kumar is the President and CEO of Voto Latino. She may have discoverable information regarding the allegations in the complaint, including but not limited to the harm that Voto Latino, Voto Latino’s constituents, and/or other similarly situated Texas voters have suffered and will suffer absent a permanent injunction granting the relief that they seek in this case.

53. Zeph Capo on behalf of Plaintiff Texas AFT

Mr. Capo may be contacted through counsel for the *LULAC* Plaintiffs. Mr. Capo is the President of Texas AFT. He may have discoverable information regarding the allegations in the complaint, including but not limited to the harm that Texas AFT, Texas AFT’s members, and/or

other similarly situated Texas voters have suffered and will suffer absent a permanent injunction granting the relief that they seek in this case.

54. Judy Bryant on behalf of Plaintiff Texas Alliance for Retired Americans

Ms. Bryant may be contacted through counsel for the *LULAC* Plaintiffs. Ms. Bryant is a Field Organizer for Texas Alliance for Retired Americans (“the Alliance”). She may have discoverable information regarding the allegations in the complaint, including but not limited to the harm that the Alliance, the Alliance’s members, and/or other similarly situated Texas voters have suffered and will suffer absent a permanent injunction granting the relief that they seek in this case.

55. Angelica Razo on behalf of Plaintiff Mi Familia Vota

Ms. Razo may be contacted through counsel for the *Mi Familia Vota* Plaintiffs. Ms. Razo is the Texas Director for Mi Familia Vota. She has knowledge of how the Mi Familia Vota voter registration and election hotline works, and how it was used in the 2020 general election in Texas to respond to calls for assistance. She served as client contact with NYU regarding a report on expanding democratic access in Texas. Ms. Razo also has knowledge regarding work done in Texas by Mi Familia Vota in preparation for the 2020 election, including work done to help Black, Latino, and Asian-American Pacific Islander (“AAPI”) voters develop plans to vote. She has knowledge about training Mi Familia Vota provided to voters and poll workers regarding the lawful activities of poll watchers.

Ms. Razo has knowledge regarding Mi Familia Vota having to divert personnel, time, and resources away from its routine community activities to respond to voting changes made in SB1, and particularly those changes that eliminate voting options that were available in the November 2020 general election. She has knowledge regarding the efforts and resources Mi Familia Vota

will have to make to help lawfully registered voters monitor voter rolls to ensure that they are not incorrectly purged from the voter rolls and to assist with the costly and complicated system of reestablishing lawful registration status.

56. Plaintiff Marla López

Ms. López may be contacted through counsel for the *Mi Familia Vota* Plaintiffs. She is the interim Houston Coordinator for Mi Familia Vota and a registered Harris County, Texas, voter. She intends to vote in the next election. Ms. López has knowledge regarding her personal experience voting early in the November 2020 election at a drive-thru location in Harris County in the evening hours and the importance of the availability of that option for both her and her father. Ms. López has knowledge regarding her own experience with voter intimidation in past elections and its personal impact on her concern about such intimidation in the future. Ms. López also has knowledge of Mi Familia Vota outreach efforts in the Houston area. She served as backup client contact with NYU regarding a report on expanding democratic access in Texas.

57. Plaintiff Marlon López

Mr. López may be contacted through counsel for the *Mi Familia Vota* Plaintiffs. Mr. López is a registered Harris County, Texas, voter. He intends to vote in the next election. He has knowledge regarding his personal experience with drive-thru voting in the November 2020 election, and the importance of the option of extended voting hours that were offered to voters during the early voting period because of his long work hours and need to travel for work. Mr. López has personal knowledge of his experience in elections prior to the November 2020 election when his work schedule and travel conflicted with limited voting hours and long lines, which ultimately prevented him from voting.

58. Plaintiff Paul Rutledge

Mr. Rutledge may be contacted through counsel for the *Mi Familia Vota* Plaintiffs. Mr. Rutledge is a registered Montgomery County, Texas, voter. He intends to vote in the next election. Mr. Rutledge has knowledge regarding his personal experience with the challenges of voting when hours or locations are limited because he works in Harris County and commutes one hour each way. He also has knowledge regarding his personal experience with early voting options that include longer hours and weekend hours.

59. Ana Gonzalez on behalf of Plaintiff Mi Familia Vota

Ms. Gonzalez may be contacted through counsel for the *Mi Familia Vota* Plaintiffs. Ms. Gonzalez is a Mi Familia Vota staff member. She has knowledge regarding Mi Familia Vota's community education and community concerns around voting rights in Texas.

60. Anita Nunez on behalf of Plaintiff Mi Familia Vota

Ms. Nunez may be contacted through counsel for the *Mi Familia Vota* Plaintiffs. Ms. Nunez is a Mi Familia Vota staff member in Texas. She has knowledge regarding Mi Familia Vota's voter registration and community education information.

61. Abby Gail Trino on behalf of Plaintiff Mi Familia Vota

Ms. Trino may be contacted through counsel for the *Mi Familia Vota* Plaintiffs. Ms. Trino is a Mi Familia Vota staff member. She has knowledge regarding Mi Familia Vota's community education and community concerns around voting rights in Texas.

62. Liz Magallanes on behalf of Plaintiff Mi Familia Vota

Ms. Magallanes may be contacted through counsel for the *Mi Familia Vota* Plaintiffs. Ms. Magallanes is a former Mi Familia Vota staff member. She has knowledge regarding Mi Familia Vota's community education and community concerns around voting rights in Texas.

63. Defendant Gregory W. Abbott, Governor of Texas

Defendant Abbott may be contacted through his counsel. Defendant Abbott is likely to have knowledge of facts related to the passage and implementation of SB1.

64. Defendant John Scott, Secretary of State of Texas

Defendant Scott may be contacted through his counsel. Defendant Scott is likely to have knowledge of facts related to the administration of elections in Texas, allegations and evidence of fraudulent voting in Texas, and the passage and implementation of SB1.

65. Defendant Warren K. “Ken” Paxton, Attorney General of Texas

Defendant Paxton may be contacted through his counsel. Defendant Paxton is likely to have knowledge of facts related to the passage and implementation of SB1, and allegations and evidence of fraudulent voting in Texas.

66. Defendant Jacquelyn F. Callanen, Bexar County Elections Administrator

Defendant Callanen is likely to have knowledge of facts related to the passage, implementation, and impact of SB1, and voter registration, election administration, and voting history in Bexar County.

67. Defendant Dana DeBeauvoir, Travis County Clerk

Defendant DeBeauvoir is likely to have knowledge of facts related to the passage, implementation, and impact of SB1, and voter registration, election administration, and voting history in Travis County.

68. Defendant Isabel Longoria, Harris County Elections Administrator

Defendant Longoria is likely to have knowledge of facts related to the passage, implementation, and impact of SB1, and voter registration, election administration, and voting history in Harris County.

69. Defendant Yvonne Ramón, Hidalgo County Elections Administrator

Defendant Ramón is likely to have knowledge of facts related to the passage, implementation, and impact of SB1, and voter registration, election administration, and voting history in Hidalgo County.

70. Defendant Michael Scarpello, Dallas County Elections Administrator

Defendant Scarpello is likely to have knowledge of facts related to the passage, implementation, and impact of SB1, and voter registration, election administration, and voting history in Dallas County.

71. Defendant Lisa Wise, El Paso County Elections Administrator

Defendant Wise is likely to have knowledge of facts related to the passage, implementation, and impact of SB1, and voter registration, election administration, and voting history in El Paso County.

B. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(ii))

The following documents, which are in the possession, custody, and control of Plaintiffs' counsel, may be relied upon by Plaintiffs to support their claims or defenses. By identifying the following categories of documents, Plaintiffs do not waive any objection, privilege, or protection and expressly reserve the right to challenge the relevance or admissibility of some or all of these documents at trial or other hearing in this matter.

LUPE Plaintiffs:

1. Documents obtained from publicly available sources, including but not limited to, historical records, newspaper articles, proposed legislation, legislative history, judicial cases, and Department of Justice objections under the Voting Rights Act; and

2. Harris County Election Security Task Force Final Productivity Report.

OCA-Greater Houston Plaintiffs:

1. Responses from Texas Legislative Offices to Public Information Act Requests for Information.
2. Written Testimony Submitted to the Legislature on proposed bills including provisions similar or identical to those at issue in this case—voluminous materials entered into the official record of legislative committees as they considered the provisions of SB1 and/or its predecessor bills, including written testimony submitted by the Plaintiffs in this case prior to passage of the bill.
3. Early Voting Ballot Board Handbook—guidance for operation of an Early Voting Ballot Board provided to local governments by the Texas Secretary of State.
4. Plaintiff League of Women Voters of Texas Materials Relating to voting by mail, voter outreach, and assistance at the polls—educational videos, informational webpages, PowerPoints, social media and e-mail communications, surveys, and training scripts aimed at educating voters and members about the mail-in ballot process, the ability to have assistance at the polls, and general voter engagement strategies.
5. Plaintiff REV-UP Texas Materials Relating to voting by mail, voter outreach, and assistance at the polls—e-mails, digital media, and social media posts, trainings, and communications aimed at educating voters about the mail-in ballot process, obtaining and usage of assistance at the polls, and outreach to voters.
6. Plaintiff Texas Organizing Project Materials Relating to voting by mail, voter outreach, and assistance at the polls—training materials and scripts for canvassers, social media and e-mail outreach correspondence, mailers, voter assistance/rides to polls training materials.
7. Plaintiff OCA-Greater Houston Materials Relating to voting by mail, voter outreach, and assistance at the polls—training materials and scripts for canvassers, social media and e-mail outreach correspondence, mailers, voter assistance/rides to polls training materials, Asian-language materials, Asian-language assistant recruiting materials and communications, event flyers and programs.
8. Plaintiff Workers Defense Action Fund Materials Relating to voting by mail, voter outreach, and assistance at the polls—canvassing training materials and scripts, voter education materials, e-mail and social media correspondence and GOTV materials.
9. Publicly Available Materials from the Secretary of State and County Defendants—copies of forms used for voting by mail, serving as an assistant, and similar public forms issued by the Texas Secretary of State.

Houston Justice Plaintiffs:

1. Plaintiffs' internal communications;
2. Defendants' internal communications;
3. Documents and communications relating to:

- a. Plaintiff Houston Justice's organizational mission, resources, and political participation activities;
 - b. Plaintiff Houston Area Urban League's organizational mission, resources, and political participation activities;
 - c. Plaintiff Delta Sigma Theta's organizational mission, resources, and political participation activities;
 - d. Plaintiff The Arc of Texas' organizational mission, resources, and political participation activities;
 - e. Plaintiff Jeffrey Clemmons's prior service as an election judge; and
4. Documents and communications produced by Defendants in this case.

LULAC Plaintiffs:

1. Based on the information reasonably available to them at this time, Plaintiffs identify the following categories of documents in their possession, custody, or control that they may use to support their claims or defenses in this matter: (i) documents related to the harm that Plaintiffs have suffered and/or will suffer as a result of SB 1, including public comments by Plaintiffs and their constituents, (ii) publicly available news reports and public coverage of SB 1, (iii) statements of Texas elected officials, legislators, and local officials, (iv) documents related to the legislative history of SB 1, including legislative debate videos, transcripts, public testimony, and bill history, and (v) publicly available data from previous elections.

Mi Familia Vota Plaintiffs:

1. Based on the information available to them at this time, the Mi Familia Vota Plaintiffs identify the following categories of documents in their possession, custody or control that may be used to support their claims in this matter: (1) Documents obtained from publicly available sources, including but not limited to, historical records, newspaper articles, proposed legislation, legislative history, judicial cases; (2) Documents related to the legislative history of SB 1 and its predecessor bills, including legislative debate videos, transcripts, public testimony, and bill history; (3) Recorded calls made to voter registration and election hotline regarding voting in Texas; (4) Staff notes regarding hearings on Texas legislature voting legislation including SB7, HB6; (5) Voting outreach materials developed for Nov. 2021 election; and (6) Capstone report prepared by NYU graduate students at the request of Mi Familia Vota regarding expanding democratic access in Texas.

Plaintiffs make this identification without waiver of their right to disclose other documents they may use to support their claims as such documents are identified.

C. A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered (Fed. R. Civ. P. 26(a)(1)(A)(iii))

Plaintiffs do not seek damages in this action; however, Plaintiffs intend to seek recovery of attorneys' fees and costs incurred in this litigation.

D. Proposed Deponents

Pursuant to this Court's instructions in the status conference held November 16, 2021, Plaintiffs provide the following list, in three tiers, of proposed deponents:

<u>Tier 1</u>	
Name	Title
Sen. Bryan Hughes	Chair of the Senate State Affairs Committee
Rep. Briscoe Cain	Chair of the House Elections Committee
Rep. Andrew Murr	Texas State Representative
Rep. Travis Clardy	Member of the House Elections Committee and the House Select Committee on Constitutional Rights and Remedies
Keith Ingram	Texas Secretary of State, Election Divisions Director
Sen. Brian Birdwell	Texas State Senator
Sen. Paul Bettencourt	Texas State Senator
Rep. Jacey Jetton	Member of the House Elections Committee and the House Select Committee on Constitutional Rights and Remedies
John Scott	Secretary of State
Rep. Dade Phelan	House Speaker

Lt. Gov Dan Patrick	President of the Senate
Rep. Terry Canales	Texas State Representative
Rep. Rafael Anchia	Chair of the Mexican American Legislative Caucus
Rep. Chris Turner	House Minority Leader and Chair of the House Democratic Caucus
Sen. Carol Alvarado	Chair of the Senate Democratic Caucus
Rep. Nicole Collier	Chair of the Texas Legislative Black Caucus
Ruth Hughs	Former Secretary of State
Christina Adkins	Texas Secretary of State, Elections Division Legal Director
Sen. Royce West	Texas State Senator
Rep. John Bucy, III	Member of the House Elections Committee and the House Select Committee on Constitutional Rights and Remedies
Jonathan White	Texas Attorney General Office, Election Integrity Division Chief
Sen. Buckingham	Texas State Senator
Rep. Metcalf	Texas State Representative
Chris Hollins	Harris County Clerk during 2020 election
Sen. Zaffirini	Member of the Senate State Affairs Committee
Ken Paxton	Attorney General
Dana DeBeauvoir	Travis County Clerk
Jacquelyn F. Callanen	Bexar County Elections Administrator
Yvonne Ramón	Hidalgo County Elections Administrator
Michael Scarpello	Dallas County Elections Administrator

Lisa Wise	El Paso County Elections Administrator
Isabel Longoria	Harris County Elections Administrator
<u>Tier 2</u>	
Name	Title
Rep. J.M. Lozano	Member of the House Select Committee on Constitutional Rights and Remedies
Sen. Jane Nelson	Texas State Senator
Sen. Joan Huffman	Texas State Senator
Rep Jim Murphy	Texas State Representative
Rep Tom Oliverson	Texas State Representative
Rep Dennis Paul	Texas State Representative
Rep. Trent Ashby	Chair of the House Select Committee on Constitutional Rights and Remedies
Sen. Bob Hall	Member of the Senate State Affairs Committee
Sen. Charles Schwertner	Texas State Senator
Rep. Mike Schofield	Member of the House Elections Committee
Rep. Stephanie Klick	Texas State Representative
Rep. Valoree Swanson	Member of the House Elections Committee
Rep. Brooks Landgraf	Texas State Representative
Rep. Matt Shaheen	Texas State Representative
Sen. Jose Menendez	Chair of the Senate Hispanic Caucus

Chuck DeVore	Policy Director for the Election Protection Project of the Texas Public Policy Foundation
Alan Vera	Chairman of the Harris County Republican Party Ballot Security Committee
Omar Escobar	Former Starr County DA, Rio Grande City, Texas
Jose Esparza	Deputy Secretary of State
Sen. Beverly Powell	Member of the Senate State Affairs Committee
Sen. Eddie Lucio, Jr.	Member of the Senate State Affairs Committee
Sen. Lois Kolkhorst	Texas State Senator
Rep. Garnet Coleman	Texas State Representative
Rep. John Turner	Texas State Representative
Rep. Dustin Burrows	Texas State Representative
Sen. Brandon Creighton	Texas State Senator
Sen. Borris Miles	Texas State Senator
Rep. Jasmine Crockett	Texas State Representative
Lauren Sullivan	Young County Elections Administrator
David Stout	El Paso County Commissioner
<u>Tier 3</u>	
Name	Title
Rep. John Zerwas	Texas State Representative
David Whitley	Former Secretary of State
Patsy Spaw	Secretary of the Senate

Justin Williamson	Chief of Staff to House Elections Committee Chair Briscoe Cain
Rep. Charlie Geren	Texas State Representative
Rep. Joe Moody	Vice Chair of the House Calendars Committee and member of the House Select Committee on Constitutional Rights and Remedies
Laura Pressley	Founder of True Texas Elections, LLC., and election security consultant
Manoj Samanta	
Aubrey Taylor	
Gerry Monroe	

Dated December 1, 2021

Respectfully submitted,

Attorneys for LUPE Plaintiffs

/s/ Nina Perales

Nina Perales (Tex. Bar No. 24005046)
Julia R. Longoria (Tex. Bar No. 24070166)
**MEXICAN AMERICAN LEGAL
DEFENSE AND EDUCATIONAL
FUND**
110 Broadway, Suite 300
San Antonio, TX 78205
Telephone: (210) 224-5476
Facsimile: (210) 224-5382
nperales@maldef.org
jlongoria@maldef.org

Michael C. Keats*
Rebecca L. Martin*
Jason S. Kanterman*
Kevin Zhen*
**FRIED, FRANK, HARRIS, SHRIVER
& JACOBSON LLP**
One New York Plaza
New York, NY 10004
Telephone: (212) 859-8000
Facsimile: (212) 859-4000
michael.keats@friedfrank.com
rebecca.martin@friedfrank.com
jason.kanterman@friedfrank.com
kevin.zhen@friedfrank.com

Christopher Bell*
**FRIED, FRANK, HARRIS, SHRIVER
& JACOBSON LLP**
801 17th Street, NW
Washington, DC 20006
Telephone: (202) 639-7000
Facsimile: (202) 639-7003
christopher.bell@friedfrank.com

/s/ Sean Morales-Doyle

Sean Morales-Doyle (NY Bar No. 5646641)
Eliza Sweren-Becker* (NY Bar No. 5424403)
Patrick A. Berry* (NY Bar No. 5723135)
Andrew B. Garber* (NY Bar No. 5684147)
Jasleen K. Singh* (Cal. Bar No. 316596)
**BRENNAN CENTER FOR JUSTICE AT
NYU SCHOOL OF LAW**
120 Broadway, Suite 1750
New York, NY 10271
Telephone: (646) 292-8310
Facsimile: (212) 463-7308
sean.morales-doyle@nyu.edu
eliza.sweren-becker@nyu.edu
patrick.berry@nyu.edu
andrew.garber@nyu.edu
jasleen.singh@nyu.edu

Paul R. Genender (Tex. Bar No. 00790758)
Elizabeth Y. Ryan (Tex. Bar No. 24067758)
Matthew Berde* (Tex. Bar No. 24094379)
Megan Cloud^ (Tex. Bar No. 24116207)
WEIL, GOTSHAL & MANGES LLP
200 Crescent Court, Suite 300
Dallas, TX 75201
Telephone: (214) 746-8158
Facsimile: (214) 746-7777
Paul.Genender@weil.com
Liz.Ryan@weil.com
Matt.Berde@weil.com
Megan.Cloud@weil.com

Alexander P. Cohen* (Tex. Bar No. 24109739)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, NY 10153
Telephone: (212) 310-8020
Facsimile: (212) 310-8007
Alexander.Cohen@weil.com

*Attorneys for Plaintiffs LULAC Texas;
Voto Latino; Texas Alliance for Retired
Americans; and Texas AFT*

/s/ Uzoma N. Nkwonta

Uzoma N. Nkwonta

Kathryn E. Yukevich*

Joseph N. Posimato*

Meaghan E. Mixon*

Graham W. White*

ELIAS LAW GROUP LLP

10 G Street NE, Suite 600

Washington, D.C. 20002

Telephone: (202) 968-4490

unkwonta@elias.law

kyukevich@elias.law

jposimato@elias.law

mmixon@elias.law

gwhite@elias.law

Jonathan P. Hawley*

ELIAS LAW GROUP LLP

1700 Seventh Avenue, Suite 2100

Seattle, Washington 98101

Telephone: (206) 656-0179

jhawley@elias.law

John R. Hardin

Texas State Bar No. 24012784

PERKINS COIE LLP

500 North Akard Street, Suite 3300

Dallas, Texas 75201-3347

Telephone: (214) 965-7700

Facsimile: (214) 965-7799

johnhardin@perkinscoie.com

*Attorneys for Plaintiffs Houston Justice;
Houston Area Urban League; Delta Sigma
Theta Sorority, Inc.; The Arc of Texas; and
Jeffrey Lamar Clemmons*

/s/ Kenneth E. Broughton

Kenneth E. Broughton

Texas Bar No. 03087250

kbroughton@reedsmith.com

Lora Spencer

Texas Bar No. 24085597

lspencer@reedsmith.com

J. Keely Dulaney*

Texas Bar No. 24116306

kdulaney@reedsmith.com

REED SMITH LLP

811 Main Street, Suite 1700

Houston, TX 77002-6110

Telephone: (713) 469-3800

Facsimile: (713) 469-3899

Sarah M. Cummings

Texas Bar No. 24094609

REED SMITH LLP

2850 N. Harwood Street, Suite 1500

Dallas, TX 75201

Telephone: (469) 680-4200

Facsimile: (469) 680-4299

scummings@reedsmith.com

Kathryn Sadasivan*

Amir Badat*

**NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.**

40 Rector Street, 5th Floor

New York, NY 10006

Phone: (212) 965-2200

Fax: (212) 226-7592

ksadasivan@naacpldf.org

abadat@naacpldf.org

Jennifer A. Holmes*

Georgina Yeomans*

**NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.**

700 14th Street NW, 6th Floor

Washington, DC 20005
Telephone: (202) 682-1300
Facsimile: (202) 682-1312
jholmes@naacpldf.org
gyeomans@naacpldf.org

Shira Wakschlag*
The Arc of the United States, Inc.
1825 K Street, NW, Suite 1200
Washington, DC 20006
Telephone: (202) 534-3708
Facsimile: (202) 534-3731
Wakschlag@thearc.org

Attorneys for Plaintiffs
OCA-Greater Houston; League of Women
Voters of Texas; REVUP- Texas; Texas
Organizing Project; and Workers Defense
Action Fund

/s/ Ryan V. Cox

Mimi M.D. Marziani
Texas Bar No. 24091906
Ryan V. Cox
Texas Bar No. 24074087
Hani Mirza
Texas Bar No. 24083512
TEXAS CIVIL RIGHTS PROJECT
1405 Montopolis Drive
Austin, TX 78741
512-474-5073 (Telephone)
512-474-0726 (Facsimile)
mimi@texascivilrightsproject.org
ryan@texascivilrightsproject.org
hani@texascivilrightsproject.org

Thomas Buser-Clancy
Texas Bar No. 24078344
Savannah Kumar
Texas Bar No. 24120098
Ashley Harris
Texas Bar No. 24123238
Andre Segura
Texas Bar No. 24107112
ACLU FOUNDATION OF TEXAS,
INC.

5225 Katy Freeway, Suite 350
Houston, TX 77007
Telephone: (713) 942-8146
Fax: (915) 642-6752
tbuser-clancy@aclutx.org
skumar@aclutx.org
pstegemoeller@aaldef.org
aharris@aclutx.org
asegura@aclutx.org

Adriel I. Cepeda Derieux*
Ari J. Savitzky*
Sophia Lin Lakin*
Samantha Osaki*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
125 Broad St., 18th Floor
New York, NY 10004
(212) 284-7334
acepedaderieux@aclu.org
asavitzky@aclu.org
slakin@aclu.org
sosaki@aclu.org

Susan Mizner*
AMERICAN CIVIL LIBERTIES UNION
FOUNDATION
39 Drumm St.
San Francisco, CA 94111
(415) 343-0781 (phone)
smizner@aclu.org

Lia Sifuentes Davis
Texas State Bar No. 24071411
Lucia Romano
Texas State Bar No. 24033013
DISABILITY RIGHTS TEXAS
2222 West Braker Lane
Austin, Texas 78758-1024
(512) 454-4816 (phone)
(512) 454-3999 (fax)
ldavis@drtx.org
lromano@drtx.org

Jerry Vattamala*
Susana Lorenzo-Giguere*
Patrick Stegemoeller*
**ASIAN AMERICAN LEGAL
DEFENSE AND EDUCATION FUND**
99 Hudson Street, 12th Floor
New York, NY 10013
(212) 966-5932 (phone)
(212) 966 4303 (fax)
jvattamala@aaldef.org
slorenzo-giguere@aaldef.org

Jessica Ring Amunson*
Urja Mittal*
JENNER & BLOCK LLP
1099 New York Ave. NW, Suite 900
Washington, DC 20001
(202) 639-6000
jamunson@jenner.com
umittal@jenner.com

*Attorneys for Plaintiffs
Mi Familia Vota; Marla López; Marlon
López; and Paul Rutledge*

s/ Marc T. Rasich
Sean Lyons
State Bar No. 00792280
Sean@lyonsandlyons.com
Clem Lyons
State Bar No. 12742000
Clem@lyonsandlyons.com
LYONS & LYONS, P.C.
237 W. Travis Street, Suite 100
San Antonio, Texas 78205
Telephone: (210) 225-5251
Telefax: (210) 225-6545

Wendy J. Olson (*Pro hac vice*)
Laura E. Rosenbaum (*Pro hac vice*)
Marc Rasich (*Pro hac vice*)
Elijah Watkins (*Pro hac vice*)
STOEL RIVES LLP
760 SW Ninth Avenue, Suite 3000
Portland, OR 97205

Courtney Hostetler (*Pro hac vice*)
Ron Fein (*Pro hac vice*)
John Bonifaz (*Pro hac vice*)
Ben Clements (*Pro hac vice*)
FREE SPEECH FOR PEOPLE
1320 Centre Street, Suite 405
Newton, MA 02459
(617)249-3015
chostetler@freespeechforpeople.org
rfein@freespeechforpeople.org
jbonifaz@freespeechforpeople.org
bclements@freespeechforpeople.org

* Admitted *pro hac vice*

^ Application for admission pending

**Not licensed by the bar of any jurisdiction

CERTIFICATE OF SERVICE

I hereby certify that on December 1, 2021, the foregoing document was served via e-mail to all counsel of record.

/s/ Nina Perales

Nina Perales